Before the FEDERAL COMMUNICATIONS COMMISSION Washington, DC 20554

In the Matter of)
TRAVELERS INFORMATON SERVICE) PS Docket 09-19

REPLY COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. ("APCO") hereby submits the following brief comments in response to the Commission's *Notice* of *Proposed Rulemaking*, FCC 10-203 (released December 30, 2010), in the above-captioned proceeding regarding Travelers Information Service ("TIS") stations.

Founded in 1935, APCO is the nation's oldest and largest public safety communications organization. Most APCO members are state or local government employees who manage and operate communications systems for police, fire, emergency medical, forestry conservation, highway maintenance, disaster relief, and other public safety agencies. APCO is the largest FCC-certified frequency coordinator for Part 90, Public Safety Pool channels, and appears regularly before the Commission on a wide variety of public safety communications issues.

APCO supports the use of TIS to provide important safety-related information to travelers, and urges the Commission to make clear that any messages concerning the safety of life or the protection of property may be transmitted on TIS stations at the discretion of the licensee. Such information may include severe weather alerts, Amber Alerts, public health messages, homeland security alerts, and civil defense notices, in addition to the traffic/road condition information already transmitted on most TIS stations.

The Commission also seeks comments on suggestions that the rules should be modified to allow <u>any</u> type of local governmental information to be broadcast on TIS stations. APCO continues to remain neutral on such a broad expansion of allowable TIS content, though we are concerned that it could dilute the emergency purposes of TIS and potentially confuse travelers accustomed to finding time-sensitive safety and traffic information on TIS stations.

Therefore, for the reasons set forth above, APCO urges the Commission to clarify the rules regarding TIS, but to proceed cautiously in addressing more fundamental modifications to this valuable service.

Respectfully submitted,

/s/

Robert M. Gurss Regulatory Counsel (202) 236-1743 gurssr@apcomail.org

APCO International Government Affairs Office 1426 Prince Street Alexandria, VA 22314

February 24, 2011